

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. __06-_____
v.	:	DATE FILED: _____
NATHANIEL SHOATZ	:	VIOLATIONS:
	:	18 U.S.C. § 1343 (wire fraud - 1 counts)
	:	18 U.S.C. § 1028A (aggravated identity theft - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Land Rover of the Main Line, 325 E. Lancaster Avenue, Wayne, Pennsylvania was engaged in the business of selling cars. As a car dealership, the business sought loans and leases for buyers of the cars. To process the loan and lease applications, the dealership required a loan application to be completed with the correct personal identification of the applicant.

2. Land Rover of the Main Line submitted information from the completed loan applications via the internet to find a lender. Based on the applicant's representations, lending institutions acted on the application.

THE SCHEME

3. On or about October 19, 2005 in Wayne, in the Eastern District of

Pennsylvania and elsewhere, defendant

NATHANIEL SHOATZ

devised and intended to devise a scheme to defraud a car dealership and loan institution, and to obtain property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant NATHANIEL SHOATZ fraudulently used the stolen identity of T.S. to attempt to obtain a car loan.

It was further part of the scheme that:

5. Defendant NATHANIEL SHOATZ unlawfully used the name of T.S. and identification and identifying information of T.S. including date of birth and social security number, without his permission or authority, to make an applications for a car loan.

6. The true T.S. lives in Wisconsin and did not give anyone permission to use his name or personal information to purchase a car in Pennsylvania.

7. On or about October 19, 2005, defendant NATHANIEL SHOATZ appeared at Land Rover of the Main Line to buy a 2006 Land Rover Sports Utility Vehicle valued at \$75, 141.00. Defendant SHOATZ completed a loan application using the stolen identity of T.S. including a social security number, and date of birth. Defendant SHOATZ signed all documents with the name of T.S.

8. On or about October 19, 2005, Land Rover of the Main Line utilized an internet cite, www.dealertrack.com to process defendant NATHANIEL SHOATZ's fraudulent loan application in the name of T.S.

9. Dealertrack utilizes the internet to link automotive dealers with banks, finance companies, credit unions and other financing sources and information providers, such as the major credit reporting agencies.

10. On or about October 19, 2005, Citizens Bank replied to Land Rover of the Main Line as a result of the dealertrack submission and informed Land Rover of the Main Line that the social security number provided does not match the identification provided.

11. On or about October 19, 2005 in Wayne, in the Eastern District of Pennsylvania and elsewhere, defendant

NATHANIEL SHOATZ

for the purpose of executing the scheme described above, caused to be transmitted signs and signals by means of wire communication in interstate commerce via the internet at Land Rover of the Main line in Wayne, Pennsylvania to www.dealertrack.com, which is located in New York.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 19, 2006 in Wayne, in the Eastern District of Pennsylvania,
and elsewhere, defendant

NATHANIEL SHOATZ

knowingly and without lawful authority transferred, possessed, and used and aided and abetted
the transfer, possession, and use of a means of identification of, another person, that is, the name,
social security number, and date of birth of T.S. during and in relation to a wire fraud, in
violation of Title 18, United States Code, Section, 1343.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1343, described in Count One of this Indictment, the defendant

NATHANIEL SHOATZ

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity,” i.e., wire fraud, including, but not limited to the following:

A. The sum of \$75,141.00 in United States currency (forfeiture money judgment).

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney